

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**In re: David Laurence Long
42666 Frontier Dr.
Ashburn, VA 20148
xxx-xx-9028
Debtor.**

**Case No. 25-10298-BFK
Chapter 13**

NOTICE OF OBJECTION AND NOTICE OF HEARING

Please take notice that the Commonwealth of Virginia, Department of Social Services, and Division of Child Support Enforcement (the “Division”) by counsel, has filed an objection to the confirmation of the above captioned Debtor’s chapter 13 plan filed March 20, 2025.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the objection, or if you want the court to consider your views on the objection, then on or before three days prior to the hearing date, you or your attorney must:

- File with the court at the address below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). The address of the clerk’s office is:

Clerk of the Court
United States Bankruptcy Court
200 S. Washington St
Alexandria, VA 22314-5405

Unless a written response and supporting memorandum are filed and served by the dated specified, the Court may deem any opposition waived, treat the objection as conceded, and issue an order granting the relief requested without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below.

- Attend the hearing to be held on **May 8, 2025 at 1:30 p.m.** in Chief Judge Kenney’s Courtroom, 200 South Washington Street, 2nd Flr, Courtroom I, Alexandria, VA 22314.

Andrew Todd Rich, VSB No. 74296
Assistant Attorney General
Division of Child Support Enforcement
P.O. Box 71900
Henrico, VA 23255
804-659-7850
todd.rich@dss.virginia.gov

- **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- A copy of any response must be mailed to the following persons:

Andrew Todd Rich, Esquire
Assistant Attorney General
Division of Child Support Enforcement
P.O. Box 71900
Henrico, VA 23255

Thomas P. Gorman, Trustee
300 North Washington Street, Suite 400
Alexandria, VA 22314

United States Trustee, Region 4
Office of the U. S. Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW the Commonwealth of Virginia, Department of Social Services, Division of Child Support Enforcement (the “Division”), by counsel, and hereby objects to the confirmation of the chapter 13 plan filed on March 20, 2025, by the debtor in the above-captioned case (the “Debtor”), and in support thereof respectfully states as follows:

A. Background

1. On February 19, 2025 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 13 of the Bankruptcy Code.
2. On March 20, 2025, the Debtor filed his proposed chapter 13 plan (the “Plan”).
3. On March 24, 2025, the Division filed a proof of claim for priority domestic support obligation arrears in the amount of \$6,065.38, designated as claim number 4 in the official claims register (the “DSO Claim”).

B. The Debtor is Not Current with Post-Petition Domestic Support Payments

1. The Debtor has one open child support case with current child support obligations with the Division and owes a claim for domestic support obligations.
2. The domestic support claim is entitled to priority under 11 U.S.C. § 507(a)(1).
3. Specifically, the Debtor is ordered to pay the following domestic support obligation on the 1st of each month:

Case Number	Monthly Support
5304734	\$756.00

4. Since the Petition Date, support for the months of March and April have come due totaling \$1,512.00. If no payments are received prior to the date of the confirmation hearing, the total post-petition default will be \$2,268.00. The last full payment

made on this case was in June of 2024. A true and exact payment record is attached as Exhibit A.

5. In order to have a chapter 13 plan confirmed, a debtor must be current on his/her payment of post-petition child support obligations pursuant to 11 U.S.C. § 1325(a)(8).

WHEREFORE, for the reasons stated herein, the Commonwealth of Virginia, Department of Social Services, Division of Child Support Enforcement, respectfully requests that the Court deny confirmation of the Debtor's chapter 13 plan and grant such other and further relief as is just and proper.

Dated: May 1, 2025

COMMONWEALTH OF VIRGINIA,

DEPARTMENT OF SOCIAL SERVICES,
DIVISION OF CHILD SUPPORT ENFORCEMENT

/s/ Andrew Todd Rich

Andrew Todd Rich, VSB No. 74296
Assistant Attorney General
Dept. of Social Services
Division of Child Support Enforcement
P.O. Box 71900
Henrico, VA 23255
804-659-7850
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Certificate of Service

I hereby certify that on the 1st day of May, 2025, I electronically filed the foregoing Objection to Confirmation of Chapter 13 Plan with the Clerk of Court using the CM/ECF system, which provides electronic notice of such filing to all parties that receive notice in this matter including the following:

Daniel M. Press, Esq.
Counsel for the Debtor

Thomas P. Gorman, Esq.
Chapter 13 Trustee

and to be sent by first class mail, postage prepaid, to the following non-CM/ECF participant:

David Laurence Long
42666 Frontier Dr.
Ashburn, VA 20148

/s/ Andrew Todd Rich
Assistant Attorney General